

(Counsel listed on next page)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

MARIAH D. THOMAS, on behalf of herself,  
all others similarly situated,

Plaintiff,

vs.

TARGET CORPORATION, a Minnesota  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

No. 4:19-cv-01131-HSG

**JOINT STIPULATION FOR ENTRY OF FINAL  
JUDGMENT**

Courtroom: 2, 1301 Clay Street, 4th Floor  
Oakland

Judge: Hon. Haywood S. Gilliam, Jr.

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24 Attorneys for Defendant Target Corporation

1 Plaintiff Mariah Thomas and defendant Target Corporation (“Target”), acting through their  
 2 respective counsel of record, hereby stipulate and respectfully request of the Court as follows:

3 1. This putative wage-and-hour class action was brought on January 29, 2019.

4 2. On April 2, 2019, Target extended to plaintiff an offer of judgment under Rule 68,  
 5 Federal Rules of Civil Procedure. (ECF 31, Exh. A.) On April 16, 2019, plaintiff accepted the Rule 68  
 6 offer. (ECF 31, Exh. B.) On April 23, 2019, the parties filed with the Court copies of both the Rule 68  
 7 offer and acceptance. (ECF 31.) Pursuant to the Rule 68 offer, the issues of attorneys’ fees and costs  
 8 remained to be decided.

9 3. After meet-and-confer efforts provided unsuccessful, on June 7, 2019, plaintiff filed a  
 10 motion for entry of judgment and an award of attorneys’ fees and costs. (ECF 36.)

11 4. Thereafter, the parties further conferred and agreed plaintiff may be awarded \$34,199.64  
 12 in attorneys’ fees and costs.

13 5. Accordingly, the parties stipulate and respectfully request that the Court enter final  
 14 judgment in this matter pursuant to the accepted Rule 68 offer, including an award to plaintiff of  
 15 \$34,199.64 in attorneys’ fees and costs, and dismiss this action with prejudice, in the form  
 16 accompanying this joint stipulation.

17 Dated: June 18, 2019.

18 SHAUN SETAREH  
 19 WILLIAM M. PAO  
 20 SETAREH LAW GROUP

21 By: /s/ Shaun Setareh

22 Shaun Setareh  
 23 Attorneys for Plaintiff Mariah Thomas

24 Dated: June 18, 2019.

25 JEFFREY D. WOHL  
 26 RYAN D. DERRY  
 27 ANNA M. SKAGGS  
 28 JEFFREY G. BRIGGS  
 PAUL HASTINGS LLP

By: /s/ Jeffrey D. Wohl

Jeffrey D. Wohl  
 Attorneys for Defendant Target Corporation

**Attestation Pursuant to Local Civil Rule 5-1(i)(3)**

Pursuant to Local Civil Rule 5-1(i)(3), I attest that concurrence in the filing of the document has been obtained from all signatories to this filing. I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 18, 2019.

/s/ Jeffrey D. Wohl

Jeffrey D. Wohl